

Jesse Sbaih & Associates, Ltd.
 Jesse M. Sbaih (#7898)
 Ines Olevic-Saleh (#11431)
 The District at Green Valley Ranch
 170 South Green Valley Parkway, Suite 280
 Henderson, Nevada 89012
 Tel (702) 896-2529
 Fax (702) 896-0529
 Email: jsbaih@sbaihlaw.com

Sonya A. Rao (*pro hac vice*)
 sonya.rao@morganverkamp.com
 MORGAN VERKAMP LLC
 35 East Seventh Street, Suite 600
 Cincinnati, OH 45202
 Telephone: 513.651.4400
 Facsimile: 513.651.4405

Attorneys for Plaintiff-Relator

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, *ex rel.*,
 TALI ARIK, M.D.,

Plaintiff,

v.

DVH HOSPITAL ALLIANCE, LLC, d/b/a,
 DESERT VIEW HOSPITAL; VALLEY
 HEALTH SYSTEM LLC; UNIVERSAL
 HEALTH SERVICES, INC.; VISTA HEALTH
 MIRZA, M.D. P.C. d/b/a VISTA HEALTH; and
 IRFAN MIRZA, M.D.

Defendants.

Case No.: 2:19-cv-01560-JAD-VCF

**ORDER TO
 EXTEND TIME TO FILE RELATOR'S
 THIRD AMENDED COMPLAINT**

(First Request)

Defendants (i.e., DVH Hospital Alliance, LLC, d/b/a Desert View Hospital; Vista Health; and Dr. Irfan Mirza) and relator Tali Arik, M.D. ("Relator")—collectively, the "Parties"—hereby stipulate and agree to an extension of the deadline to file a Third Amended Complaint ("TAC"). The Parties also set forth a stipulated briefing schedule related to the TAC. In support of this Stipulation, the Parties assert the following:

1 1. Relator recently retained Morgan Verkamp LLC as additional counsel in this matter,
2 and, on April 19, 2021, attorney Sonya A. Rao of that firm was granted permission to practice in this
3 District *pro hac vice*. (Doc. 98.)

4 2. Soon thereafter, on May 4, 2021, this Court issued an order that: granted Defendants'
5 motions to dismiss Relator's Second Amended Complaint (Docs. 69, 70, 72); dismissed Relator's
6 first and second causes of action without prejudice;¹ and permitted Relator to file a TAC by May 17,
7 2021. (Doc. 100.)

8 3. To allow Relator's new counsel sufficient time to familiarize herself with this matter,
9 and to accommodate counsel's obligations in other matters, the Parties agree to extend the deadline
10 for Relator to file his TAC by 15 days, i.e., through June 1, 2021. This is the Parties' first request
11 for such an extension, which is made in good faith and not for the purpose of delay.

12 6. The Parties also agree to the following extended briefing schedule relating to the
13 TAC, which accommodates the Parties' case deadlines in other matters:

- 14 a. Defendants' deadline to file their renewed motion(s) to dismiss Relator's TAC shall
15 be June 29, 2021;
- 16 b. Relator's deadline to file his opposition(s) to Defendants' renewed motion(s) to
17 dismiss shall be July 27, 2021; and
- 18 c. Defendants' deadline to file their reply (or replies) to Relator's opposition(s) shall be
19 August 10, 2021.

20 Accordingly, for the reasons set forth above, the Parties respectfully request that the Court:
21 (1) extend the deadline to file a TAC, up to and including June 1, 2021; and (2) adopt the above-
22 described briefing schedule relating to the TAC.

23
24
25
26
27 ¹ Relator's conspiracy claim was dismissed with prejudice. Because that claim was the only one
28 asserted against defendants Valley Health System LLC, d/b/a The Valley Health System and
Universal Services, Inc., those defendants are no longer parties to this action.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

DATED this 11th day of May, 2021.

/s/ Sonya A. Rao

JESSE SBAIH & ASSOCIATES, LTD.
Jesse M. Sbaih (#7898)
Ines Olevic-Saleh (#11431)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012

MORGAN VERKAMP LLC
SONYA A. RAO (*pro hac vice*)
35 East Seventh St., Suite 600
Cincinnati, OH 45202

Attorneys for Plaintiff-Relator

DATED this 11th day of May, 2021.

/s/ Gregory R. Jones

McDERMOTT WILL & EMERY LLP
Thomas A. Ryan (admitted *pro hac vice*)
Gregory R. Jones (admitted *pro hac vice*)
2049 Century Park East, Suite 3200
Los Angeles, CA 90067-3206

JOHN H COTTON & ASSOCIATES, LTD.
John H. Cotton (Nevada Bar No. 005268)
Katherine L. Turpen (Nevada Bar. No. 008911)
7900 W. Sahara Ave., Suite 200
Las Vegas, Nevada 89117

*Attorneys for Defendants DVH Hospital
Alliance, LLC*

/s/ Crane M. Pomerantz

SKLAR WILLIAMS PLLC
Crane M. Pomerantz, Esq.
Nevada Bar No. 14103
Brent M. Resh, Esq.
Nevada Bar No. 14940
410 South Rampart Boulevard, Suite 350
Las Vegas, Nevada 89145

*Attorneys for Defendants Dr. Mirza and Vista
Health*

IT IS SO ORDERED.

U.S. Magistrate Judge
Cam Ferenbach

Y

DATED: May 12, 2021